

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

COMMUNICATIONS UNLIMITED  
CONTRACTING SERVICES, INC., et  
al.,

Plaintiffs,

v.

BROADBAND INFRASTRUCTURE  
CONNECTION, LLC, et al.,  
Defendants.

Case No. 4:16-cv-00516-AGF

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**DEFENDANT’S OBJECTIONS AND COUNTER-DEPOSITION DESIGNATIONS**

Defendant Mid-Continent Casualty Company (“MCC”) submits the following objections and counter-designations concerning Plaintiffs’ designation of deposition testimony of Sean O’Donnell and Ronald Williams.

**Sean O’Donnell (8/10/2016)**

**1. Counter-Designations**

MCC incorporates by reference the designations Plaintiffs submitted and submits the following counter-designations for the deposition of Sean O’Donnell.

Page 51, Line 19 – Page 53, Line 1

Page 62, Line 12 – Page 63, Line 2

Page 66, Line 20 – Page 67, Line 20

Page 68, Line 19–25

Page 70, Line 7-24

Page 71, Line 6-13

Page 72, Line 4-25

**Ronald Williams (8/10/2016)**

**1. Objections**

MCC objects to the following designations of testimony by Ronald Williams on the basis that the testimony is not relevant to remaining issues before this Court: (1) CUI's claim for attorney's fees related to MCC's counter-claim, and (2) allocation of the settlement of Jane Doe's claims against Charter and CUI.

Page 18, Line 24 - Page 19, Line 22.

Page 22, Line 8-10.

Page 22, Line 18-23.

Page 96, Line 18-23.

**2. Counter-Designations**

MCC incorporates by reference Plaintiffs' designation of testimony of Ronald Williams for which MCC has not submitted an objection and submits the following counter-designations for his testimony.

Page 26, Line 20 – Page 27, Line 6.

Page 60, Line 5 – Page 61, Line 20.

Respectfully submitted,

**SANDERS WARREN RUSSELL & SCHEER LLP**

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**ATTORNEYS FOR MID-CONTINENT  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on October 15, 2020, the above and foregoing was filed via the court's electronic filing system and served via email to all counsel of record, including:

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